

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS**

ROBERT CHASE,
Plaintiff

V.

QUINN FISHERIES, INC.,
Defendant

Civil Action

No. 05-11739-JLT

JOINT SCHEDULING STATEMENT

Now come the parties in the above-captioned matter and respectfully submit this joint proposed scheduling statement.

1. Beginning of Unrestricted Discovery

Completion of automatic discovery and commencement of unrestricted discovery
on March 16, 2006.

2. Designation of Plaintiff's Expert Testimony

Complete designation of expert testimony (including complete answers to expert interrogatories and/or completion of Rule 26 expert materials if required) on or before August 15, 2006.

3. Designation of Defendant's Expert Testimony

Complete designation of expert testimony (including complete answers to expert interrogatories and/or completion of Rule 26 expert materials if required) on or before September 15, 2006.

4. All Dispositive Motions

All dispositive motions to be filed on or before October 16, 2006.

5. Close of Discovery

All discovery to be concluded on or before October 16, 2006.

6. Final Pretrial Conference

Final pretrial conference to be held on some date after October 16, 2006.

7. Deposition Testimony to be Used in Lieu of Trial Testimony

The Parties reserve the right to take de bene esse depositions of witnesses who will be unavailable for trial, at any time up to and including the last Friday preceding the date of trial.

8. Ready for Trial

The parties will be prepared for trial in this matter on or after October 16, 2006. Plaintiff and Defendant attorneys affirmatively state that they have discussed the probable budget for prosecuting and defending this action with their clients and he signature of the Plaintiff and Defendant will follow.

Respectfully submitted for the
the Plaintiff, ROBERT CHASE,
by his attorneys,

/s/ Carolyn M. Latti
David F. Anderson
BBO #560994
Carolyn M. Latti
BBO # 567394
Latti & Anderson LLP
30-31 Union Wharf
Boston, MA 02109
(617) 523-1000

Respectfully submitted for the
Defendant, Quinn Fisheries, Inc.,
by its attorney,

/s/ Robert J. Murphy
Robert J. Murphy, Esquire
BBO # 557659
Holbrook & Murphy
15 Broad Street, Suite 900
Boston, MA 02109
(617) 428-1151

Dated: March 2, 2006

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2006, I electronically filed Joint Scheduling Statement with the Clerk of the Court using CM/ECF system and will send a copy of such filing(s) to the following:

Robert J. Murphy, Esquire
Holbrook & Murphy
15 Broad Street, Suite 900
Boston, MA 02109

Respectfully submitted for the
the Plaintiff,

/s/ Carolyn M. Latti
/s/ Carolyn M. Latti
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617-523-1000

